



Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

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Lisa Thuot, EPA Project Manager
EPA Region 1 New England
5 Post Office Square Mail Code 07-1
Boston, MA 02109-3912

March 30, 2020

Re: MassDEP comment on Nyanza Chemical Waste Dump Superfund Site Proposed Plan, Operable Unit 2

Dear Ms. Thuot,

MassDEP has reviewed the Nyanza Chemical Waste Dump Proposed Plan for Operable Unit 2, dated January 2020, and offers the following comment:

The Proposed Plan includes a table which lists the preliminary remediation goals (PRGs) for groundwater (Table 1). This table indicates that the PRGs are based on a carcinogenic Target Risk of 1×10^{-4} or a Hazard Quotient of one. MassDEP did not find mention of cumulative risk in either the Proposed Plan or the Feasibility Study, and is curious if EPA evaluated cumulative risk (across multiple chemicals). If the PRGs for individual chemicals are based on EPA's upper limit for risk (1×10^{-4} for carcinogenic risk and 1 for non-carcinogenic risk), then the sum of risks from multiple chemicals could exceed this upper limit. MassDEP recognizes that this would not impact the Selected Remedy, however, it may change the estimated length of time required until PRGs are met.

MassDEP appreciates the opportunity to review the Proposed Plan and Feasibility Plan.

Please feel free to contact me if you have any questions.

Jennifer McWeeney

Jennifer McWeeney, MassDEP project manager

Cc: Ms. Zanetta Purnell, EPA Community Involvement

This information is available in alternate format. Contact Michelle Waters-Ekanem, Director of Diversity/Civil Rights at 617-292-5751.

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